

1 THE HONORABLE JOHN C. COUGHENOUR
2
3
4
5
6
7
8

9
10 UNITED STATES DISTRICT COURT
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

WESTERN DISTRICT OF WASHINGTON

KRISTIN BAIN,

Plaintiff,

v.

ONEWEST BANK, F.S.B.; DEUTSCHE
BANK NATIONAL TRUST COMPANY;
MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS; REGIONAL
TRUSTEE SERVICES,

Defendants.

No.: 2:09-cv-00149 JCC

**DECLARATION OF RONALDO
REYES IN SUPPORT OF DEUTSCHE
BANK NATIONAL TRUST
COMPANY'S REPLY IN SUPPORT
OF ITS MOTION FOR PARTIAL
SUMMARY JUDGMENT**

Declaration of Ronaldo Reyes

1. I am a Vice President for Deutsche Bank National Trust Company ("Deutsche
20 Bank"), as Trustee and Custodian for Home Equity Mortgage Loan Asset-Backed Trust, Series
21 INABS 2007-B, Home Equity Mortgage Loan Asset-Backed Certificates, Series INABS 2007-B
22 ("Trust"), a Defendant in the above-captioned action. As Vice President, my responsibilities
23 include, among other things, managing trust administrators. I am familiar with Deutsche Bank's
24 practices regarding the generation and retention of business records, including but not limited to
25
26

DECLARATION OF RONALDO REYES
IN SUPPORT OF DEFENDANT DEUTSCHE BANK'S
MOTION FOR PARTIAL SUMMARY JUDGMENT

1

DAVIES LAW GROUP LLC
COLUMBIA CENTRE
701 5TH AVENUE, SUITE 4200
SEATTLE, WA 98104
PHONE: 206-262-8050

1 its custody and control of business records, and certain procedures relating to the preservation
2 and maintenance of such records, including promissory notes it possesses in its capacity as
3 custodian of mortgage-backed security trusts. I have personal knowledge of the facts set forth in
4 this Declaration and, if called as a witness, could and would testify competently to such facts
5 under oath.

7 2. In connection with the above-captioned action, I have confirmed that Deutsche
8 Bank is in possession of the Plaintiff's original Promissory Note, endorsed in blank. A true and
9 correct copy of Plaintiff's Promissory Note is attached hereto as Exhibit A.

10 3. Deutsche Bank holds the Promissory Note in its capacity as the Trustee and
11 Custodian of the Trust. IndyMac Bank, F.S.B., as Depositor under a Pooling and Servicing
12 Agreement dated as of June 1, 2007 ("PSA"), assigned the ownership interest in Plaintiff's note to
13 Deutsche Bank on behalf of the certificate holders of the Trust. A true and correct copy of the PSA
14 and the Mortgage Loan Schedule, redacted to show only the Plaintiff's loan, is attached hereto as
15 Exhibit B.

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 17th day of February, 2011

Ronaldo Reyes

DECLARATION OF RONALDO REYES
IN SUPPORT OF DEFENDANT DEUTSCHE BANK'S
MOTION FOR PARTIAL SUMMARY JUDGMENT

DAVIES LAW GROUP LLC
COLUMBIA CENTRE
701 5TH AVENUE, SUITE 4200
SEATTLE, WA 98104
PHONE: 206-262-8050